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June 28, 2000

Re: Updated Estimates for Percent of Wine Imports Treated With Vinclozolin

To: Deanna Scher, SRRD

From: Steve Nako, BEAD

Table 1 list my revised percent of crop treated (%CT) estimates for imported grapes (wine). I lowered the percent of wine that is imported down from 25% to 17%, based on the updated trade data I received from BASF. I also revised the likely average %CT down from [REDACTED] to [REDACTED] and the likely maximum %CT down from [REDACTED] to [REDACTED] based on the market data provided by BASF. The remainder of this memo highlights some of the details regarding these revised figures.

**Table 1. Updated Estimates for Percent of Wine-Imports Treated with Vinclozolin.**

	% of US Wine Consumption that is imported	% of Imported Wine Treated w/Vinclozolin (likely average)	% of Imported Wine Treated w/Vinclozolin (likely max)
Previous QUA Estimate	25%	[REDACTED]	[REDACTED]
Revised QUA Estimate	17%	[REDACTED]	[REDACTED]

- Our recent data (Produce Studies) supports the claims made by the registrant that they halted marketing of vinclozolin in Chile. We do not have pesticide data for Australian grapes. My estimates are based on the assumption that BASF will allow those existing registrations to lapse, and will NOT reenter these markets in the future (Chile is our third largest source of wine imports). That assumption is based on discussions the agency has had with BASF officials.
- BASF did not provide any counter estimates to my previous ones. They did provide more recent data to calculate the percent of wine imports: 17% in 1996, 21.9% in 1997 and 11.8% in 1998 (averages out to about 17%); as well as marketing data on international pesticide use.
- BASF appears to have a different data source for estimates of foreign pesticide use. Their estimates for %CT Grapes (pp.9-11), are generally similar to the estimates that we have in our Produce Studies (formerly Landell Mills) database. The biggest difference in the %CT estimates is for Germany. BASF has an average [REDACTED] CT treated for 1996-1998 (p.9 of 18); our database had higher use estimates [REDACTED] in 1996, and [REDACTED] in 1997). Germany accounts for about 2.5% of total imports (p.7)
- France and Italy account for about 63% of all imported wine (p.7); a significant percent of the total. In some years, vinclozolin use in both of those countries are somewhat high. For example, in 1996 [REDACTED] of the grapes in France were treated with vinclozolin, while [REDACTED] of the grapes in Italy were also treated that year.